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STATE OF WASHINGTON

DEPARTMENT OF ECOLOGY

Mail Stop PV-11 • Olympia, Washington 98504-8711 • (206) 459-6000

START

June 20, 1989

R.E. LERCH

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Mr. R.D. Izatt, Director Environmental Restoration Division U.S. Department of Energy P.O. Box 550 Richland, WA 99352

Mr. R.E. Lerch, Manager Environmental Division Westinghouse Hanford Company P.O. Box 1970 Richland, WA 99352

Dear Messrs. Izatt and Lerch:

Re: Notice of Violation

This notice serves as initial warning that the Hanford Reservation stands in violation of Washington State Dangerous Waste Regulations concerning security and management of containers (WAC 173-303-310 & -630).

These violations were noted during a June 12, 1989 inspection of the 183-H Basins and the S-10 Pond and Ditch. Attachment 1 to this notice lists these violations and notes corrective actions, which if taken on your part, will suspend further action by our office in this regard.

A follow-up inspection will be conducted at the above units to verify compliance with this notice. Attachment 2 to this notice is a Certificate of Compliance. Please fill this form out and submit it to Ecology no later than August 15, 1989. Should you choose not to comply, further administrative and/or legal actions will be taken.

I recommend that you evaluate other sites on the reservation for similar violations. You may contact our office for guidance when conducting corrective actions at locations other than those cited in this notice.



Messrs. Izatt and Lerch June 20, 1989 Page 2

Regulatory or technical inquiries regarding this issue may be directed to Mr. Joe Witczak at (206) 438-7557.

Sincerely,

Roger Stanley

Hanford Project Manager

Attachments

cc: Paul Day

Roger Freeburg Carol Geier

ATTACHMENT

1. Violation: A security system as per WAC 173-303-310 does not exist at the S-10 Pond and Ditch location.

Corrective Action: Construct at least a continuous single-strand rope fence around the S-10 Pond and Ditch before August 15, 1989. This fence should be appropriately marked with dangerous waste and/or radiation warning signs. This fence will serve as a temporary safety measure. The installation of a permanent security system will be addressed in the compliance action schedules (Milestone M-22-00) to be issued by our office in December 1989.

2. Violation: Two corroded and leaking drums were noted at the 183-H Basins. These drums were uncovered and contained mixed wastes. This is a container management violation of WAC 173-303-630(2) & (5)(a).

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Corrective Action: Repack the material from these drums into new containers and dispose of the failed drums per state Dangerous Waste Regulations within 48 hours of receiving this notice. Inspect other drums at the RMW storage facility which came from this site for similar leakage within one week of receiving this notice. Provide an assessment of the corrosion by the next unit managers meeting scheduled for this facility on July 18, 1989.

Please complete and return this form to Roger Stanley, Washington Department of Ecology, Hanford Project, Mail Stop PV-11, Olympia, Washington 98504, by August 15, 1989.

Certificate of Compliance

As a legal representative of U.S. Department of Energy, I certify that to the best of my knowledge, the compliance status at our hazardous waste facility located at Facility I.D. No. WA7890008967 is as shown below.						
Items of <u>Noncompliance</u>	Category <u>I, II, III</u>	Compliance <u>Date</u>	Compliance Status (Check One) Complied Not Complied	<u>Comments</u>		
Security Systems (S-10 Pond and Ditch)	П	August 15, 1989				
Repack Drums	П	48 Hrs After Rece	ipt			
Inspect RMW Facility	ш	Within 1 Wk of Re	Vithin 1 Wk of Receipt			
Corrossion Assessment	ш	July 18, 1989				
		(Cian a 411)				
		(Signatur	e)			
		(Printed	Name)			
		(Title)				
		(Date)				

DISTRIBUTION COVERSHEET

Author

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Addressee

Incoming $\,$ Correspondence No.

RF Stanley/WSDOE

RD Izatt/RE Lerch

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Subject Notice of Violation

Action By: 08/15/89, GWJ

HEM

Internal Distribution						
Approval Date		Name	Location	w/att		
		Correspondence Control		Х		
		RJ Baumnardt	R2-40	х		
		RJ Bliss	B3-04	х		
		GD Carpenter	H4-51	x		
		HF Daugherty	R2-53	x		
		KL Hoewing	B3-06	х		
1		MC Hughes	R1-15	х		
		GW Jackson	R2-29	х		
		RE Lerch (Assignee)	H4-51	х		
		DW Lindsey	R2-82	x		
		HE McGuire	H4-51	x		
		JE Nolan	B3-01	x		
		EDMC	H4-51	х		
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